

UNITED STATES BANKRUPTCY COURT
for the Eastern District of Pennsylvania

In re	:	Case No. 22 - 13063
Tyesha N. Pollard	:	(Chapter 13)
Debtor.	:	
	:	Hon. Eric L. Frank
	:	

Debtor's Motion to Extend Time

AND NOW, comes Debtor, Tyesha N. Pollard, by and through her attorney, Ronald G. McNeil, Esquire, hereby moves for an extension of time to file her Summary of Assets and Liabilities, Schedules with Declaration, Statement of Financial Affairs, Chapter 13 Plan, Chapter 13 Statement of Current Monthly Income, and Attorney Disclosure Statement, and, as reasons therefor, states as follows:

1. On November 15, 2022, Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. The Summary of Assets and Liabilities, Schedules with Declaration, Statement of Financial Affairs, Chapter 13 Plan, Chapter 13 Statement of Current Monthly Income, and Attorney Disclosure Statement are due on or before November 29, 2022.
3. Debtor needs an additional fourteen (14) days to prepare her Summary of Assets and Liabilities, Schedules with Declaration, Statement of Financial Affairs, Chapter 13 Plan, Chapter 13 Statement of Current Monthly Income, and Attorney Disclosure Statement, because Debtor's counsel has not completed these forms for Debtor's final review.

4. Debtor requests that this Honorable Court grant her an extension of an additional fourteen (14) days, until December 13, 2022, to prepare and to file her Summary of Assets and Liabilities, Schedules with Declaration, Statement of Financial Affairs, Chapter 13 Plan, Chapter 13 Statement of Current Monthly Income, and Attorney Disclosure Statement, pursuant to Rules 1007(c) and 3015(b) of the Federal Rules of Bankruptcy Procedure.
5. This motion is not made for the purpose of delay and no creditor will suffer any prejudice, if the extension of time is granted.
6. This motion may be considered ex parte.

WHEREFORE, Debtor respectfully requests that this Honorable Court grant her an extension of an additional fourteen (14) days to prepare her Summary of Assets and Liabilities, Schedules with Declaration, Statement of Financial Affairs, Chapter 13 Plan, Chapter 13 Statement of Current Monthly Income, and Attorney Disclosure Statement.

Respectfully submitted,

/s/ Ronald G. McNeil
Ronald G. McNeil, Esquire
Attorney for Debtor
DATE: November 29, 2022
1333 Race Street
Philadelphia, PA 19107-1585
(215) 564 - 3999 (t)
(215) 564 - 3537 (fx)
r.mcneil@verizon.net

UNITED STATES BANKRUPTCY COURT
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In re : Case No. 22 - 13063
Tyesha N. Pollard (Chapter 13)
Debtor.
Hon. Eric L. Frank

ORDER

AND NOW, upon consideration of Debtor's Motion to Extend Time, and any responses thereto, it is hereby ORDERED that Debtor shall file her Summary of Assets and Liabilities, Schedules with Declaration, Statement of Financial Affairs, Chapter 13 Plan, Chapter 13 Statement of Current Monthly Income, and Attorney Disclosure Statement on or before December 13, 2022. If Debtor fails to file these required documents within the required time, this case may be dismissed without additional notice or opportunity for a hearing.

DATE: 12/1/22

A handwritten signature in black ink, appearing to be 'E. Frank', written over a horizontal line.

Hon. Eric L. Frank
U.S. Bankruptcy Judge

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CERTIFICATE OF SERVICE

Pursuant to Rule 9014-2(a)(3) of the Local Bankruptcy Rules, I, Ronald G. McNeil, Esquire, certify that a true and correct copy of Debtor's Motion to Extend Time was served via electronic means, via hand delivery, and/or via first class postage prepaid, properly franked upon the following:

Kenneth E. West, Esquire
Chapter 13 Standing Trustee
P.O. Box 40837
Philadelphia, PA 19107-0837

Office of the U.S. Trustee
Robert N.C. Nix, Sr. Federal Bldg
900 Market Street, Suite 320
Philadelphia, PA 19107-4202

/s/ Ronald G. McNeil
Ronald G. McNeil, Esquire
Attorney for Debtor
DATE: November 29, 2022